

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 4:18 CR 588 RWS NCC
	)	
LEONTAYE COMBS,	)	
	)	
Defendant.	)	

**MOTION FOR PRETRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Jeannette S. Graviss, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds for detention, the Government states the following factors pursuant to Title 18, United States Code, Section 3142(g)(1), (2), and 3(A) for this Court to consider:

assure the appearance of the defendant as required and the safety of the community.

**The Nature and Circumstances of the Offense**

1. The defendant is charged with one count of being a felon in possession of a firearm in violation of 18 U.S.C. § 922(g)(1) and one count of being a felon in possession of ammunition in violation of 18 U.S.C. § 922(g)(1). On May 30, 2018, officers from the St. Louis Metropolitan Police Department ("SLMPD") attempted to stop a 2007 Chrysler 300 after a series of traffic violations. The driver failed to yield and fled to the residence at 3488 Pine Grove Avenue. At that point, the defendant exited the vehicle and fled towards the rear of the residence. When officers converged to confront the defendant, he produced a handgun and turned towards a SLMPD officer. Fearing for

his life, the SLMPD officer fired multiple gunshots, wounding the suspect. The defendant was taken into custody without further incident.

**The History and Characteristics of the Defendant**

2. On or about April 2, 2018, the defendant was charged with Assault 1<sup>st</sup>, Armed Criminal Action and Resisting Arrest in St. Louis County, Missouri in Cause Number 18SL-CR02537. The case is still pending.

3. On or about July 12, 2013, the defendant was convicted of three counts of Assault 1<sup>st</sup> and three counts of Armed Criminal Action in St. Louis County, Missouri in Cause Number 12SL-04119. The defendant was sentenced to five years imprisonment.

4. On or about July 12, 2013, the defendant was convicted of Assault on a Corrections Officer in St. Louis County, Missouri in Cause Number 12SL-08321. The defendant was sentenced to five years imprisonment.

**The Nature and Seriousness of the Danger to the Community**

5. The defendant has a prior criminal history involving assaulting a law enforcement officer and resisting arrest and causing the risk of serious physical injury.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and the safety of any other person and the community and the government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance

JEFFREY B. JENSEN  
United States Attorney

/s/ Jeannette S. Graviss  
JEANNETTE S. GRAVISS, #44483MO  
Assistant United States Attorney